

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**UNITED STATES SECURITIES
AND EXCHANGE COMMISSION,**

Plaintiff,

v.

**DRIVE PLANNING, LLC and
RUSSELL TODD BURKHALTER,**

Defendants,

and

**JACQUELINE BURKHALTER,
THE BURKHALTER RANCH,
DRIVE PROPERTIES, LLC, TBR
SUPPLY HOUSE, INC., and DRIVE
GULFPORT PROPERTIES,**

Relief Defendants.

**Civil Action No.
1:24-cv-03583-VMC**

RELIEF DEFENDANTS' PRELIMINARY INJUNCTION DISCLOSURES

COME NOW, Relief Defendants, by and through counsel, and submit their responses to Section III of the *Preliminary Injunction Freezing Assets and Granting Other Equitable Relief* [Doc. No. 11] and respectfully state as follows:

(A) all names by which every person with authority to exercise control of that Defendants or Relief Defendant is known and the nationality of such persons;

RESPONSE: Jacqueline Burkhalter has authority to exercise control of Drive Properties, LLC, Drive Gulfport Properties, LLC, and TBR Supply House, Inc. She is the sole member of the two limited liability companies and the sole shareholder of TBR Supply House. She is the 50% member of The Burkhalter Ranch and has authority to make decisions on behalf of the Ranch and to manage the day to day business of the Ranch. Defendant Todd Burkhalter, the other 50% member, exercises control of the Ranch and all major decisions and expenditures are approved by Defendant Todd Burkhalter.

(B) all business and residence addresses, postal box numbers, telephone numbers, and facsimile numbers, e-mail addresses, safety deposit boxes, and storage facilities used by any Relief Defendant or by any person under their direct or indirect control, at any time since January 1, 2015 through the present; and

RESPONSE:

Jacqueline Burkhalter

Residential Addresses:

2015	180 Witheridge Drive, Johns Creek, GA
2017	782 Peachtree Street NE, # 607, Atlanta, GA
2019	782 Peachtree Street NE, #1033, Atlanta, GA
2019	855 Central Avenue NE, #403, St. Petersburg, FL
4/2022	330 East Second Street, Blue Ridge, GA
10/2022- 8/2024	1673 Hardscrabble Road, Mineral Bluff, GA

10/2022 – 176 4th Avenue NE, #1101, St. Petersburg, FL
2/2023

Personal Phone Number: [REDACTED]

Email Addresses: [REDACTED]@gmail.com

PLEASE NOTE THAT MRS. BURKHALTER, FOR HERSELF AND THE OTHER RELIEF DEFENDANTS, AND HER COUNSEL HAVE COMMUNICATED THROUGH THIS EMAIL ADDRESS. THESE COMMUNICATIONS ARE SUBJECT TO AND PROTECTED BY THE ATTORNEY CLIENT PRIVILEGE.

Safe Deposit Box: None

Storage Facility: Blue Ridge Storage Solutions
111 Tom Boyd Rd Blue Ridge GA
Unit B23
Only Mrs. Burkhalter's personal items are stored
in this storage unit.

Drive Properties

Business Addresses:

855 Central Avenue NE, #403, St. Petersburg, FL
8000 Avalon Blvd., #279, Alpharetta, GA

Phone Number: [REDACTED]

Email Addresses: driveproperties632@gmail.com

Safe Deposit Box: None to Ms. Burkhalter's knowledge

Storage Facility: None to Ms. Burkhalter's knowledge

Drive Gulfport Properties

Business Addresses:

855 Central Avenue NE, #403, St. Petersburg, FL
176 4th Avenue NE, #1101, St. Petersburg, FL

Phone Number: [REDACTED]

Email Addresses: None

Safe Deposit Box: None to Ms. Buckhalter's knowledge

Storage Facility: None to Ms. Burkhalter's knowledge

The Burkhalter Ranch

Business Addresses:

1061 & 1019 Hardscrabble Road, Mineral Bluff, GA

Phone Number: [REDACTED]

Email Addresses: info@burkhalterco.com

Safe Deposit Box: None to Ms. Buckhalter's knowledge

Storage Facility: None to Ms. Burkhalter's knowledge

Staurolite Barn

Business Addresses:

1061 Hardscrabble Road, Mineral Bluff, GA

Phone Number: [REDACTED]

Email Addresses: info@burkhalterco.com

Safe Deposit Box: None to Ms. Buckhalter's knowledge

Storage Facility: None to Ms. Burkhalter's knowledge

TBR Supply House

Business Addresses:

10091 Blue Ridge Drive, Suite A, Blue Ridge, GA

Phone Number:

Email Addresses: sandra@burkhalterco.com

Safe Deposit Box: None to Ms. Buckhalter's knowledge

Storage Facility: None to Ms. Burkhalter's knowledge

(C) each account with any financial institution or brokerage firm maintained in any Relief Defendant's name or held for any Defendant's or Relief Defendant's direct or indirect beneficial interest from January 1, 2015 through the present.

RESPONSE:

The Burkhalter Ranch Corporation

South State Bank	Business checking		
	Business checking		Staurolite Barn
Chase	Business checking		

TBR Supply House

South State Bank	Business checking		
	Business checking		TBR Outdoor Supply

Drive Gulfport Properties

South State	Business checking	
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Drive Properties

Chase	Business checking	
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Jacqueline Burkhalter

Chase Personal checking
 Bill pay checking.
 Savings
[REDACTED]
 Money Market



Respectfully submitted, this 18th day of August 2024.

ROUNTREE LEITMAN KLEIN & GEER, LLC

/s/ Ceci Christy

Ceci Christy, Ga. Bar No. 370092

Century Plaza I

2987 Clairmont Road, Suite 350

Atlanta, Georgia 30329

(404) 584-1238 Telephone

cchristy@rlkglaw.com

Attorneys for Relief Defendants

CERTIFICATE OF SERVICE

I hereby certify that on August 18, 2024, I electronically filed the foregoing pleading using the CM/ECF System that will automatically send e-mail notification of such filing to all registered attorneys of record in this case.

This 18th day of August 2024.

ROUNTREE LEITMAN KLEIN & GEER, LLC

/s/ Ceci Christy

Ceci Christy

Georgia Bar No. 370092

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